



**ROCKY
MOUNTAIN
FARMERS
UNION**

OFFICE OF THE PRESIDENT

COLORADO, NEW MEXICO, WYOMING

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May 18, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

RE: [Docket No. 98N-1038]
Comments regarding FDA's labeling requirements for irradiated foods.

On behalf of the 23,000 family farmers and ranchers that are members of Rocky Mountain Farmers Union (RMFU) in Colorado, New Mexico and Wyoming I am writing today to express my concern regarding the Food and Drug Administration's proposed revisions to the labeling requirements for irradiated foods. Many of the producers RMFU represents produce natural and organic commodities. Our organization did not support the policy change allowing irradiation of meat and poultry products because of the concern that it would encourage processors and packers to disregard food safety and handling procedures because the product could be irradiated to kill pathogens introduced during processing. We advocated eliminating pathogens by following safe food handling procedures rather than irradiating contaminants that should never be introduced into foodstuffs.

The FDA is soliciting comments on two issues: (1) whether the wording of the current radiation disclosure statement should be revised, and (2) whether such labeling requirements should expire at a specified date in the future.

Our membership agrees that irradiated food should be labeled as such. Because irradiation of food is still a controversial concept to consumers, especially with the recent advent of irradiation of meat and poultry, Farmers Union advocates that the radiation disclosure statement should be prominent and placed on the front of the product's label near the description of the food contained within the package. We agree with the comments made by the National Consumers League that, contrary to the FDA's current provision, the radiation disclosure statement should be more prominent than the listing of ingredients.

As organic and natural food producers, our members rely heavily on the accuracy and truthfulness of labels. This is a difficult market for many of our members and they cannot tolerate labels that mislead consumers. These agriculture producers fear that if consumers start to lose confidence in the labels they rely on for information on the food they eat, consumers will not trust any food label—something that could seriously harm the organic and natural food industry.

Farmers Union also supports the use of the radura logo placed prominently on the labels of irradiated foods. To eliminate this symbol would mislead consumers who use the for information about the food that they buy.

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The FDA should not provide for expiration of the radiation disclosure statement, or of the radura logo on irradiated foods. As processors continue to rely on irradiation to solve the problem of food contamination, we anticipate that the number of irradiated food products will rise. Consumers will become more familiar with the statement and the logo—but to yank it off the labels at some date in the future would only serve to mislead consumers and provide an advantage to processors and retailers who could then place their product next to a non-irradiated product and claim similarity.

Other comments the FDA is soliciting on this issue are whether a disclosure statement on irradiated foods causes “inappropriate anxiety” and whether alternate wording such as “cold pasteurization” or “electronic pasteurization” would convey meaningful information to consumers.

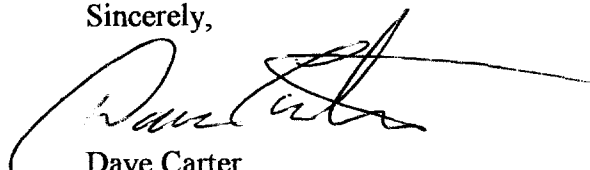
Consumers should be informed about what they consume. Processors have deemed this to be “inappropriate anxiety” because they are concerned about consumers finding out the truth about how food is processed. Irradiation in meats and poultry was allowed in part to provide a solution to the numerous outbreaks of e-coli contamination. Processors do not want consumers to know that e-coli comes from fecal matter present in foods. Irradiation may kill the e-coli, but it does not get rid of the fecal matter present in the foodstuff. Anxiety about foreign matter in our foods is not inappropriate—it’s healthy.

Our organization has joined many other consumer organizations in calling for additional research on the effects of irradiation on food quality and the people who consume it. Labeling of irradiated foods as such allows the consumer to be informed about the food that he chooses to eat. It does not promote “inappropriate anxiety.”

As to whether irradiated foods should be labeled with an alternative word like “pasteurized” we believe that this would mislead the consumer. Consumers are familiar with pasteurization. The process has been tested thoroughly and people have reason to trust it. However, irradiation is not the same thing and has not been tested for years. The FDA has a duty to ensure that food labels are truthful and not misleading. To allow the use of the words “cold pasteurization” in place of irradiation and the radura logo would result in a failure to perform that duty.

Thank you for the opportunity to express our organization’s concerns related to the labeling of irradiated foods. Should you have any questions or need clarification please contact me.

Sincerely,

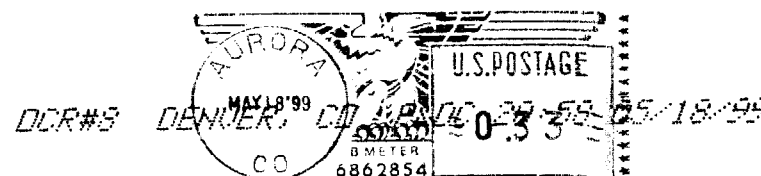
A handwritten signature in black ink, appearing to read "Dave Carter", with a long horizontal flourish extending to the right.

Dave Carter
President



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